

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION, : ELECTRONICALLY FILED
:
Plaintiff, : Case No.: 07 Cv. 8383 (LAP)
: (HP) ECF ACTION
:
-against- :
:
BLOOMBERG L.P., : ANSWER
:
Defendant. :
:
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:
JILL PATRICOT, TANYS LANCASTER,
MONICA PRESTIA and JANET LOURES, :
:
Plaintiffs- Intervenors, :
:
-against- :
:
BLOOMBERG L.P., :
:
Defendant. :
:
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Defendant Bloomberg L.P. ("Bloomberg"), by and through its undersigned
counsel, Willkie Farr & Gallagher LLP, hereby answers the Complaint filed by Plaintiff Equal
Opportunity Commission (the "Complaint") as follows:

AS TO ALLEGATIONS CONCERNING JURISDICTION AND VENUE

1. Paragraph 1 states a legal conclusion as to which no response is necessary.
2. Bloomberg denies the allegations contained in paragraph 2 of the
Complaint.

AS TO ALLEGATIONS CONCERNING PARTIES

3. Bloomberg admits the allegations contained in paragraph 3 of the Complaint.

4. Bloomberg admits the allegations contained in paragraph 4 of the Complaint.

5. Bloomberg admits the allegations contained in paragraph 5 of the Complaint.

AS TO THE ALLEGATIONS IN THE STATEMENT OF CLAIMS

6. Bloomberg admits the allegations in the first sentence of paragraph 6 of the Complaint but denies the allegations in the second sentence of paragraph 6.

7. Bloomberg denies all allegations in paragraph 7 of the Complaint, including the allegations contained in subparagraphs 7(a)-(e), and specifically denies the existence of a pattern or practice of unlawful employment practices.

8. Bloomberg denies the allegations contained in paragraph 8 of the Complaint.

9. Bloomberg denies the allegations contained in paragraph 9 of the Complaint.

10. Bloomberg denies the allegations contained in paragraph 10 of the Complaint.

AFFIRMATIVE DEFENSES

1. The Complaint fails to state a claim upon which an award of punitive damages may be granted.

2. Plaintiff Equal Employment Opportunity Commission failed to adequately exhaust conciliation efforts.

3. Plaintiff Equal Employment Opportunity Commission's claims are barred in whole or in part by applicable statutes of limitation.

4. Bloomberg's employment decisions with respect to non-clerical female employees ("Claimants") were not motivated in whole or in part by gender or status as a pregnant person.

5. Bloomberg's employment decisions with respect to Claimants were not motivated in whole or in part as a retaliation for engaging in a protected activity.

WHEREFORE, Bloomberg demands judgment dismissing the Complaint with prejudice and granting to Bloomberg its costs and expenses of this action, including reasonable attorneys' fees and other such and further relief as this Court may deem just and appropriate.

Dated: New York, New York
December 3, 2007

WILLKIE FARR & GALLAGHER LLP

By 

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